

EXHIBIT A

From: Matt H. Cline <matt@gideoncooper.com>
Sent: Friday, January 29, 2016 11:31 AM
To: Chalos, Mark P.
Cc: C. J. Gideon; Chris J. Tardio; Ginger F. Ward; Martin, Annika K.; Puig, Yvonne K.; Adam Schramek (adam.schramek@nortonrosefulbright.com); Hoffman, Eric (eric.hoffman@nortonrosefulbright.com); Gerard Stranch (gerards@bsjfirm.com); Ben Gastel (beng@bsjfirm.com)
Subject: RE: Wray Motion for Qualified Protective Order

Mark:

Thank you for getting back to me on such short notice. We do not agree to your proposal of having a representative of the Wrays present at a meeting with Dr. Ledford. We believe we are entitled to an *ex parte* interview pursuant to T.C.A. 29-26-121(f). We will be prepared to argue the motion at the February status conference. I assume you will inform Dr. Ledford that the deposition is postponed.

Thanks.

Matt

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From: Chalos, Mark P. [<mailto:mchalos@lchb.com>]
Sent: Friday, January 29, 2016 10:23 AM
To: Matt H. Cline
Cc: C. J. Gideon; Chris J. Tardio; Ginger F. Ward; Martin, Annika K.; Puig, Yvonne K.; Adam Schramek (adam.schramek@nortonrosefulbright.com); Hoffman, Eric (eric.hoffman@nortonrosefulbright.com); Gerard Stranch (gerards@bsjfirm.com); Ben Gastel (beng@bsjfirm.com)
Subject: RE: Wray Motion for Qualified Protective Order

Matt –

We would agree to permit a meeting with Dr. Ledford, if he consents, so long as a representative of the Wrays is present.

If your team rejects that proposal, let's present this issue for hearing at the February status conference, with the understanding that it would be fully briefed by then. We would agree to continue the deposition of Dr. Ledford until the court rules.

-Mark



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From: Matt H. Cline [<mailto:matt@gideoncooper.com>]

Sent: Thursday, January 28, 2016 7:14 PM

To: Chalos, Mark P.; Martin, Annika K.; Puig, Yvonne K.; Adam Schramek (adam.schramek@nortonrosefulbright.com); Hoffman, Eric (eric.hoffman@nortonrosefulbright.com)

Cc: C. J. Gideon; Chris J. Tardio; Ginger F. Ward

Subject: Re: Wray Motion for Qualified Protective Order

Mark:

I decided to hold off on filing the motion in the hopes that we may be able to reach some sort of agreement. I'm planning to file by 12:00 pm EST (11:00 am CST) tomorrow. If you think we can come to some sort of agreement, please let me know before 11:00 am CST tomorrow. Otherwise, I will file our motion.

Thanks.

Matt

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On Jan 28, 2016, at 4:18 PM, Matt H. Cline <matt@gideoncooper.com> wrote:

Mark:

Last Friday, we filed our motion for Qualified Protective Order in the *Wray* case seeking permission to interview Dr. Ledford. Given that Dr. Ledford's deposition date (2/8/16) is fast approaching, we need to decide how to address the pending motion and deposition date. We already agreed to have this issue heard telephonically prior to the deposition. We intend to file an emergency motion TONIGHT requesting that:

1. The Court set an expedited deadline for your response.
2. The Court set a telephonic hearing prior to 2/8/16. (We are available any day next week.)
3. If the Court has not entered an order prior to 2/8/16, the deposition is stayed.

If either (1) or (2) is not workable for you, it may be better to go ahead and postpone the deposition. In my view, it would probably be better to postpone the deposition regardless, but I understand if you want to keep the date.

I intend to file this motion tonight. Please let me hear from you regarding the above by 6:00 pm CST. If we can agree to postpone the deposition, it's probably not necessary that I file the motion.

Please feel free to call my direct line at the office, (615) 742-9525, prior to 6:00 pm if you would like to discuss.

Thanks.

Matt

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